

HONORABLE TIFFANY M. CARTWRIGHT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

RYAN RANER, an individual,
Plaintiff,

v.

THE FUN PIMPS ENTERTAINMENT,
LLC, a Texas limited liability company;
RICHARD HUENINK, JR., an individual;
and JOEL HUENINK, an individual,
Defendants.

Case No. 3:22-cv-05718-TMC

STIPULATED MOTION AND
[PROPOSED] ORDER TO EXTEND
DISCOVERY DATES

THE FUN PIMPS ENTERTAINMENT,
LLC, a Texas limited liability company,
Counterclaim Plaintiff,

v.

RYAN RANER, an individual,
Counterclaim Defendant.

NOTE ON MOTION CALENDAR: October
26, 2023

STIPULATION

The parties jointly stipulate and respectfully move the Court for an order extending all discovery dates as set forth herein. The extension of the discovery dates as requested herein will not impact the trial or related dates. The parties believe that good cause is shown for this extension for at least the following reasons:

- The current initial expert disclosure deadline is November 13, 2023, and rebuttal

expert disclosures due on December 13, 2023.

- Plaintiff has requested, and Defendant has agreed, to extend the initial expert disclosure and rebuttal expert disclosure deadlines.
- Along with the extended expert disclosure deadlines, both parties agree that additional time is needed to complete discovery in light of both witness and counsel professional and personal commitments, extending the close of discovery by one month, from January 22nd to February 23rd.
- The parties also request that the dispositive motion deadline be extended by two weeks, from February 21st to March 7th to allow the completion of discovery prior to the deadline for dispositive motions.
- The requested extensions do not impact the current trial setting or any trial-related deadlines.

The proposed new schedule is as follows:

Action	Current Date	Proposed Date
5 DAY JURY TRIAL set for 09:00 AM	May 21, 2024	No change
Disclosure of expert testimony under FRCP 26(a)(2)	Nov 13, 2023	Dec 4, 2023
Disclosure of rebuttal expert testimony under FRCP 26(a)(2)	Dec 13, 2023	Jan 15, 2024
All motions related to discovery must be filed by	Dec 26, 2023	Jan 26, 2024
Discovery completed by	Jan 22, 2024	Feb 23, 2024
All dispositive motions must be filed by	Feb 21, 2024	Mar 7, 2024
Motions in limine should be filed pursuant to Local Rule CR 7(d)(4) by	Apr 15, 2024	No change
Agreed pretrial order filed with the Court by	Apr 29, 2024	No change
Trial briefs, proposed <i>voir dire</i> , jury instructions, agreed neutral statement of the case and deposition designations due by	Apr 30, 2024	No change
Pretrial conference will be held at 03:00 PM on	May 6, 2024	No change

The stipulated extension is not submitted for the purposes of delay, but rather due to litigation and party logistics, and is in the interest of justice and fairness. The parties respectfully request that the Court agree to the stipulated extension of time and issue the proposed order submitted herewith.

RESPECTFULLY SUBMITTED: October 27, 2023.

s/ Ashley J. McDonald, WSBA No. 58237
ashley@focallaw.com
s/ Venkat Balasubramani, WSBA No. 28269
venkat@focallaw.com
FOCAL PLLC
900 1st Ave. S., Suite 201
Seattle, WA 98134
T: 206.529.4827

Attorneys for Ryan Raner

I certify that this memorandum contains 388 words, in compliance with the Local Civil Rules.

s/ David A. Lowe, WSBA No. 24453
Lowe@LoweGrahamJones.com
LOWE GRAHAM JONES PLLC
1325 Fourth Avenue, Suite 1130
Seattle, WA 98101
T: 206.381.3300

J. Pat Heptig (admitted *pro hac vice*)
PHeptig@HeptigLaw.com
HEPTIG LAW GROUP, LTD.
4140 Deep Valley Dr.
Dallas, TX 75244
T: 214.856.0714

Attorneys for Defendant

ORDER

Pursuant to the Stipulation of the parties, IT IS SO ORDERED.

DATED this 27th day of October, 2023.



Tiffany M. Cartwright
United States District Court Judge